

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ZHANG Jingrong, ZHOU Yanhua, ZHANG Peng,
ZHANG Cuiping, WEI Min, LO Kitsuen, LI Xiurong,
CAO Lijun, HU Yang, GAO Jinying, CUI Lina, XU Ting,
and BIAN Hexiang,

Plaintiffs,

vs.

Chinese Anti-Cult World Alliance (CACWA), Michael
CHU, LI Huahong, WAN Hongjuan, ZHU Zirou, &
DOES 1-5 Inclusive,

Defendants.

**DECLARATION OF TERRI
MARSH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

No. 15-CV-1046 (SLT) (VMS)

TERRI E. MARSH, an attorney admitted to practice before this Court, declares the following under penalty of perjury:

1. I am the Executive Director and Senior Litigation partner of the Human Rights Law Foundation and Plaintiffs' counsel in this action. I am familiar with the proceedings in this matter and I submit this declaration in support of Plaintiffs' motion for partial summary judgment.

2. Annexed hereto are the following exhibits:

- Exhibit 1. Excerpts of the Core Religious "Bible" of Falun Gong: Zhuan Falun
- Exhibit 2. Excerpts of Teachings of Zhuan Falun
- Exhibit 3. Excerpts of Supplementary Teachings of Falun Gong
- Exhibit 4. Excerpts of Deposition of Cao Lijun
- Exhibit 5. Excerpts of Deposition of Wei Min
- Exhibit 6. Excerpts of Deposition of Gao Jinying
- Exhibit 7. Excerpts of Deposition of Zhou Yanhua
- Exhibit 8. Excerpts of Deposition of Hu Yang
- Exhibit 9. Excerpts of Deposition of Lo Kitsuen
- Exhibit 10. Excerpts of Deposition of Cui Lina
- Exhibit 11. Excerpts of Deposition of Zhang Peng

- Exhibit 12. Excerpts of Deposition of Zhang Jingrong
- Exhibit 13. Excerpts of Deposition of Xu Ting
- Exhibit 14. Excerpts of Deposition of Li Xiurong
- Exhibit 15. Excerpts (A-E) from U.S. Commission on International Religious Freedom Reports
- Exhibit 16. Excerpts from August 15, 2017 Remarks of Secretary of State Tillerson
- Exhibit 17. Excerpts (A-B) from Department of State Human Rights Reports on China Reports
- Exhibit 18. Excerpt from H. Com. Int'l Rel, Subcommittee on Africa, Glob. H. Rts. & Int'l Operations
- Exhibit 19. Excerpts (A-D) from United States House Resolutions
- Exhibit 20. Excerpts (A-E) from Congressional-Executive Commission on China Annual Reports
- Exhibit 21. Excerpts of Deposition of Michael Chu
- Exhibit 22. CACWA Articles of Incorporation
- Exhibit 23. Excerpts from the CACWA Shitou Newsletter
- Exhibit 24. Excerpts of Deposition of Dr. Xia Ming
- Exhibit 25. Expert Report by Dr. Arthur Waldron
- Exhibit 26. Excerpts of *The Religion of Falun Gong* by Dr. Benjamin Perry
- Exhibit 27. Excerpts of Deposition of Dr. Arthur Waldron
- Exhibit 28. Expert Report by Dr. Xia Ming
- Exhibit 29. Rebuttal Expert Report by Caylan Ford
- Exhibit 30. Excerpts of Deposition of Hongjuan Wan
- Exhibit 31. Excerpts of Deposition of Zhu Ziroui
- Exhibit 32. Excerpts of Deposition of Li Huahong

3. Certain of these exhibits, e.g., Exhibits 1, 2, and 3, are excerpts from materials that would otherwise be difficult or lengthy to produce in their original form, and have been submitted in this condensed form for the Court's convenience. We are prepared to introduce these materials at trial in their original form and we believe there will be no dispute about their admissibility.

4. We believe that these exhibits and the materials contained therein show that there is no genuine dispute of fact that Falun Gong is a religion and that certain of Defendants' counterclaims are untimely and baseless.

WHEREFORE, plaintiffs request the Court grant their motion for partial summary judgment, and for any further relief the Court deems necessary and proper.

Dated: New York, New York
November 10, 2017

/s/

TERRI E. MARSH